



171611

February 25, 2002

Via Courier

Ms. Carol Ropski  
U.S. Environmental Protection Agency  
Emergency Enforcement & Support Section, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Re: Request to CVP Systems, Inc. ("CVP") for Information Pursuant  
to Section 104 of CERCLA for the Downers Grove Groundwater  
Site in Downers Grove, Illinois, received by CVP on February 4, 2002

Dear Ms. Ropski:

We are writing in response to the above request for information dated January 30, 2002 to CVP from Mr. Richard C. Karl, Chief, Emergency Response Branch, of the United States Environmental Protection Agency ("EPA"), relating to CVP's facilities at 2514-2518 Wisconsin Avenue, Downers Grove, Illinois ("Facility"), the only facilities CVP has ever had within the above Groundwater Site.

The numbers and letters indicated below for each information request correspond to the numbers and letters set forth in Attachment B to the request. CVP's answers are as follows:

1. Persons consulted in the preparation of these answers:

The following CVP employees:

Wesley P. Bork, Jr., President  
Ken Gidewall, Engineer Manager  
Laurie G. Mykleby, Vice President  
Rae Anne Rymarsuk, General Accountant

2. Documents consulted, examined or referred to in the preparation of the answers, and which are enclosed with this letter, except as otherwise indicated:

The enclosed Attachment 2A contains copies of such documents.

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3. Persons who may be able to provide a more detailed or complete response or additional documents, as indicated:

A. Lessor of the Facility: Park Investors Venture I, L.L.C., c/o Darwin Asset Management Company, 970 N. Oaklawn Avenue, Suite 100, Elmhurst, Illinois 60126.

B. Provider referenced in ##9 and 21 below: Safety Kleen Corporation, P.O. Box 1800, Elgin, Illinois 60121.

C. Provider referenced in #9 below: BFI Alliance, 5050 West Lake Street, Melrose Park, Illinois 60160.

4. Persons having knowledge or information about the generation, transportation ... of hazardous substances ...:

None that we know of, since there was no handling of hazardous substances by CVP. With respect to prior owners/operators, the EPA could contact the lessor referred to in #3 above.

5. Between 1950 and the present, did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials (including chlorinated solvents) at any location in the Ellsworth Industrial Park? If the answer is anything but an unqualified "no", identify items (a)-(f) of request #5.

Unqualified no.

6. Nature of CVP's activities or business at the Site ... with respect to purchasing, receiving ...hazardous substances or materials at the Site:

None, since there was no handling of hazardous substances by CVP at the Site.

7. Dates during which CVP owned, operated or leased a portion of the Site and copies of documents evidencing or relating to such ownership, operation or lease arrangement (e.g. deeds, leases, etc.):

CVP has only been a lessee of the Facility. It moved into the Facility on August 1, 1984. Pursuant to paragraph 6 of Attachment A to the request for information, the lease itself is enclosed in a separate envelope marked "Confidential" because of CVP's claim of confidentiality and trade secret protection with respect to that item. See enclosed claim letter.

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8. Information about the Facility, including but not limited to the items listed in (a)-(g) of request #8:

With respect to items (a)-(f), the EPA could contact the lessor referred to in #3 above.  
With respect to (g), two maps of the Facility, without dimensions, are enclosed as Attachment 8A.

9. Past and present solid waste management units at the Facility, providing for each the information listed in (a)-(g) of request #9:

The only solid waste management units at the Facility are two mini-dumpsters provided by BFI Alliance and located by the back door of the 2516 unit on the west side of the Facility. The units are used for general, non-hazardous trash. Each has a capacity of approximately 10 cubic yards. The units are emptied by BFI Alliance two times a week. They appear to be made of metal and have been provided at the Facility since August 1, 1984 by BFI Alliance or one of its predecessor companies. The enclosed map (Attachment 8A) shows the units' boundaries and location.

In addition, from May 1991 to February 1998, the Safety Kleen Corporation provided a tank for disposal of lubricant for metal working machines and a parts washing system. During that time, Safety Kleen drained and picked up the spent fluid. Attachment 8A shows the tank's former boundary and location.

10. Prior owners of the Facility, identifying for each the information listed in (a)-(c) of request #10:

We are not aware of the prior owner(s) of the Facility (if any). With respect to these items, the EPA could contact the lessor referred to in #3 above.

11. Prior operators, including lessors, of the Facility, identifying for each the information listed in (a)-(d) of request #11:

We are not aware of the prior owner(s) of the Facility (if any). With respect to these items, the EPA could contact the lessor referred to in #3 above.

12. Copies of all local, state and federal environmental permits ever granted for the Facility or any part thereof:

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None. We are not aware of any environmental permits granted for the Facility.

13. Did the Facility ever have "interim status" under RCRA?

No. The Facility never had "interim status" under RCRA.

14. Did the Facility ever file a notification of hazardous waste activity under RCRA?

No. The Facility never filed a notification of hazardous waste activity under RCRA.

15. All reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the Facility, providing copies of all documents containing such data and information ...:

None. We are not aware of any such reports, information or data.

16. All leaks, spills or releases or threats of releases into the environment of any hazardous substances ... that have occurred at or from the Facility, including the information listed in (a)-(g) of request #16, and provide copies of related documents:

None - unqualified no.

17. Was there ever a spill, leak, release or discharge of hazardous materials (including chlorinated solvents) into any subsurface disposal system or floor drain inside or under any building you own or operate at the Site? Identify the information listed in (a)-(g) of request #17, and provide copies of related documents, if the answer is anything but an unqualified no.

No - unqualified no.

18. Did any leaks, spills or releases of hazardous materials occur at the Facility when such materials were being delivered, stored, transported or transferred or treated? If so, provide copies of related documents.

Unqualified no.

19. Has soil ever been excavated or removed from the Facility? If the answer is anything besides an unequivocal "no," provide the information listed in (a)-(i) of request #19 and copies of related documents.

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No - unequivocal no.

20. Records from 1950 through the present showing how much chlorinated solvent/cleaner or other chlorinated materials were purchased for the Facility; records from 1950 through the present showing how much chlorinated solvent/cleaner or other chlorinated materials were sent from the Facility to be recycled or disposed; and manifests showing such recycling or disposal:

None. CVP did not and does not use chlorinated solvent/cleaner or other chlorinated materials.


21. All records regarding the disposal of solid waste from the Facility from 1950 to present:

Copies of CVP's representative records regarding disposal of trash in the mini-dumpsters and of lubricant in the Safety Kleen tank are enclosed as Attachment 2A.

We have also enclosed a claim letter providing an explanation of the basis for the claim of confidentiality/trade secret protection with respect to the document enclosed in the Confidential envelope in response to request #7.

Very truly yours,

CVP Systems, Inc.

  
By Richard D. Kelly  
Vice President and General Manager

CC: Joel S. Corwin, Attorney

Enclosures:  
Attachment 2A  
Attachment 8A  
Confidentiality Claim letter

EPA Feb02.let

ATTACHMENT 2A



5050 W. Lake Street  
Melrose Park, IL 60160

ADDRESSEE:



032250-125

CVP SYSTEMS  
2518 WISCONSIN AVE  
DOWNERS GROVE, IL 60515

## INVOICE

CONTACT US AT:

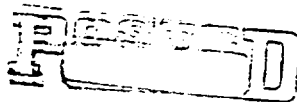
ATTN: CUSTOMER SERVICE DEPT.  
CALL:(708) 345-7050

INVOICE NO.	INVOICE DATE	ACCOUNT NO.
551-000833671	05/20/01	551-0261465

NOTES:

A

DESCRIPTION	QUANTITY	PRICE	AMOUNT
00001 2518 WISCONSIN AVE SERVICE GROUP 01 QTY 001 FRONT LOAD 10 YARDS 05/20/01 BASIC SERVICE 06/01 TO 06/30		760.61	760.61



R041

PAYMENT DUE BY	INVOICE AMOUNT
UPON RECEIPT	760.6



5050 W. Lake Street  
Melrose Park, IL 60160

ADDRESSEE:

009645-36  
CVP SYSTEMS  
2518 WISCONSIN AVE  
DOWNERS GROVE, IL 60515

INVOICE

CONTACT US AT:

ATTN: CUSTOMER SERVICE DEPT.  
CALL:(708) 345-7050

INVOICE NO.	INVOICE DATE	ACCOUNT NO.
551-000845456	06/20/01	551-0261465
NOTES:		

A

DESCRIPTION	QUANTITY	PRICE	AMOUNT
00001 2518 WISCONSIN AVE SERVICE GROUP 01 QTY 001 FRONT LOAD 10 YARDS 06/20/01 BASIC SERVICE 07/01 TO 07/31		760.61	760.61
PAYMENT DUE BY		INVOICE AMOUNT	
UPON RECEIPT		760.6	



5080 W. Lake Street  
Melrose Park, IL 60150

ADDRESSEE:



033930-131

CVP SYSTEMS  
2518 WISCONSIN AVE  
DOWNERS GROVE, IL 60515

## INVOICE

CONTACT US AT:

ATTN: CUSTOMER SERVICE DEPT.  
CALL:(708) 345-7050

INVOICE NO.	INVOICE DATE	ACCOUNT NO.
551-000866951	07/20/01	551-0261465

NOTES:

A

DESCRIPTION	QUANTITY	PRICE	AMOUNT
00001 2518 WISCONSIN AVE SERVICE GROUP 01 QTY 001 FRONT LOAD 10 YARDS 07/20/01 BASIC SERVICE 08/01 TO 08/31		790.61	790.61
<p><u>August</u></p> <p>Boyl</p> <p>PAID</p>			
PAYMENT DUE BY			INVOICE AMOUNT
UPON RECEIPT			790.61





5050 W. Lake Street  
Melrose Park, IL 60160

**ADDRESSEE:**



007569-37

CVP SYSTEMS  
2518 WISCONSIN AVE  
DOWNERS GROVE, IL 60515

**INVOICE**

**CONTACT US AT:**

ATTN: CUSTOMER SERVICE DEPT.  
CALL:(708) 345-7050

INVOICE NO.	INVOICE DATE	ACCOUNT NO.
551-000884432	08/20/01	551-0261465

**NOTES:**

A

DESCRIPTION	QUANTITY	PRICE	AMOUNT
00001 2518 WISCONSIN AVE SERVICE GROUP 01 QTY 001 FRONT LOAD 10 YARDS 08/20/01 BASIC SERVICE 09/01 TO 09/30		790.61	790.61
<i>Roll 8/31/01</i>		<b>POSTED</b>	
		<b>PAYMENT DUE BY</b> UPON RECEIPT	<b>INVOICE AMOUNT</b> 790.61



5050 W. Lake Street  
Melrose Park, IL 60160

ADDRESSEE:



012506-53

CVP SYSTEMS  
2518 WISCONSIN AVE  
DOWNERS GROVE, IL 60515

## INVOICE

CONTACT US AT:

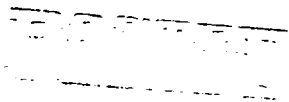
ATTN: CUSTOMER SERVICE DEPT.  
CALL:(708) 345-7050

INVOICE NO.	INVOICE DATE	ACCOUNT NO.
551-000896714	09/20/01	551-0261465
NOTES:		

A

DESCRIPTION	QUANTITY	PRICE	AMOUNT
00001 2518 WISCONSIN AVE SERVICE GROUP 01 QTY 001 FRONT LOAD 10 YARDS 09/20/01 BASIC SERVICE 10/01 TO 10/31		790.61	790.61

R041



PAYMENT DUE BY	INVOICE AMOUNT
UPON RECEIPT	790.61

# POSTED



**safety-kleen corp.**

ORIGINAL INVOICE  
INVOICE NO: M88739  
INVOICE AMT: 469.00

PAGE 1 OF 1

LOCATION # 5-034-01	ACCOUNT NUMBER 5-034-01-9387-1	CUSTOMER ORDER NO		RELEASE NO		INVOICE NO M88739	
VENDOR #	TAX STATUS/NUMBER	SERVICE DATE 03-16-95	INVOICE DATE 03-24-95		PAY INVOICE BY 04-03-95		
BILL TO CVP SYSTEMS INC ATTN JEANNE DODROW 2518 WISCONSIN AVE DOWNERS GROVE, IL 60515		SERVICE ADDRESS					
FOR INFORMATION PLEASE CALL SK SERVICING LOCATION: ELGIN, IL		(708) 468-6510					
CUSTOMER ITEM #	DESCRIPTION	INT WEEK	QUANTITY	UOM	UNIT COST	TAX	ITEM TOTAL
	WASTE, NON-SPEC FUELS 0082102		1	DR	415.00	.00	415.00
	DRUM, 55 O.H. MT-USED 8003369		1	EA	54.00	.00	54.00
	INVOICE TOTAL						469.00

BOX 1800  
ELGIN, IL 60121-7857  
DUNS No. 05106-0408  
FED. ID NO. 39-6090019

ORIGINAL INVOICE



5118  
#2 3/13/98

ACCOUNT NUMBER <b>5-034-01-9387-1</b>		LOCATION # 5-034-01	CUSTOMER ORDER NO		INVOICE NO <b>032329</b>
BILL TO	TAX STATUS/NUMBER	SERVICE DATE 02-27-98	INVOICE DATE 02-27-98	PLEASE PAY INVOICE BY <b>03-14-98</b>	

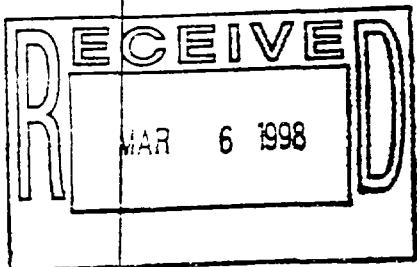
SERVICE ADDRESS



CVP SYSTEMS INC  
2518 WISCONSIN AVE  
DOWNERS GROVE IL 60515-4230

**POSTED**

PRODUCT/SERVICE #	DESCRIPTION	QUANTITY	UOM	UNIT COST	TAX	ITEM TOTAL
0087174	WASTE, WATER 55-1	1	DR	327.00	.00	327.00
0003369	EMPTY DRUM 55	1	EA	70.00	4.73	74.73
	INVOICE TOTAL				4.73	401.73



FOR INFORMATION PLEASE CALL SK SERVICING LOCATION: (847) 468-6510 ELGIN IL

What does "Best People" mean? Ask your Rep to explain our Advanced Certification Training and to tell you how the entire Safety-Kleen Team works for you. Our "behind the scenes" experts ensure that your waste is handled in total compliance with all Federal, State and local regulations.

PLEASE DO NOT USE ANY STAPLES WITH REMITTANCE



BOX 1800  
ELGIN, IL 60121-7857  
DUNS No. 05106-0408  
FED. ID NO. 39-6090019

ORIGINAL INVOICE

5110  
AD

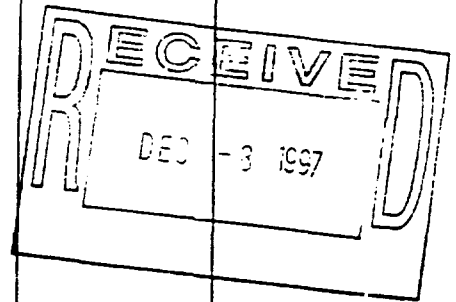
ACCOUNT NUMBER 5-034-01-9387-1		LOCATION # 5-034-01	CUSTOMER ORDER NO		INVOICE NO 633815	
BILL TO	TAX STATUS/NUMBER	SERVICE DATE 12-02-97	INVOICE DATE 12-03-97	PLEASE PAY INVOICE BY 12-18-97		

SERVICE ADDRESS



CVP SYSTEMS INC  
2518 WISCONSIN AVE  
DOWNERS GROVE IL 60515-4230

PRODUCT/SERVICE #	DESCRIPTION	QUANTITY	UOM	UNIT COST	TAX	ITEM TOTAL
0087174	WASTE, WATER 55-1	2	DR	303.00	.00	606.00
0003369	EMPTY DRUM 55	2	EA	68.00	9.18	145.18
	INVOICE TOTAL				9.18	751.18



FOR INFORMATION PLEASE CALL SK SERVICING LOCATION: (847) 468-6510 ELGIN IL

Safety-Kleen is a proud sponsor of America Recycles Day on November 15th. America Recycles Day is a nationwide event that will feature the public's use of recycled products. As one of the nation's largest recyclers of contaminated waste, Safety-Kleen would like to encourage the use of "America's Choice" re-refined oil. You can find this quality oil at all Goodyears and Wal-Marts. Look for the "We Care" logo at the businesses that recycle everyday using Safety-Kleen's services.

PLEASE DO NOT USE ANY STAPLES WITH REMITTANCE

RETURN THIS PORTION WITH PAYMENT TO: P.O. BOX 1800 ELGIN IL 60121-7857

ACCOUNT NUMBER	INVOICE NUMBER	SERVICE DATE	INVOICE DATE	BILL TO
5-034-01-9387-1	633815	12-02-97	12-03-97	

633815 503401938710075118000918

CVP SYSTEMS INC

2518 WISCONSIN AVE  
DOWNERS GROVE IL 60515-4230

AMOUNT DUE 751.18
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TX 1800  
IN, IL 60121  
No. 05-05-0408  
Q NO. 39-6090019

ORIGINAL INVOICE

*S110*  
*91*

ACCOUNT NUMBER <b>5-034-01-9387-1</b>	LOCATION # <b>5-034-01</b>	CUSTOMER ORDER NO	INVOICE NO <b>M17788</b>
TAX STATUS/NUMBER	SERVICE DATE <b>02-16-96</b>	INVOICE DATE <b>02-21-96</b>	PLEASE PAY INVOICE BY <b>03-07-96</b>

BILL TO

SERVICE ADDRESS

CVP SYSTEMS INC

2518 WISCONSIN AVE  
DOWNERS GROVE, IL 60515

*Shop Expense*

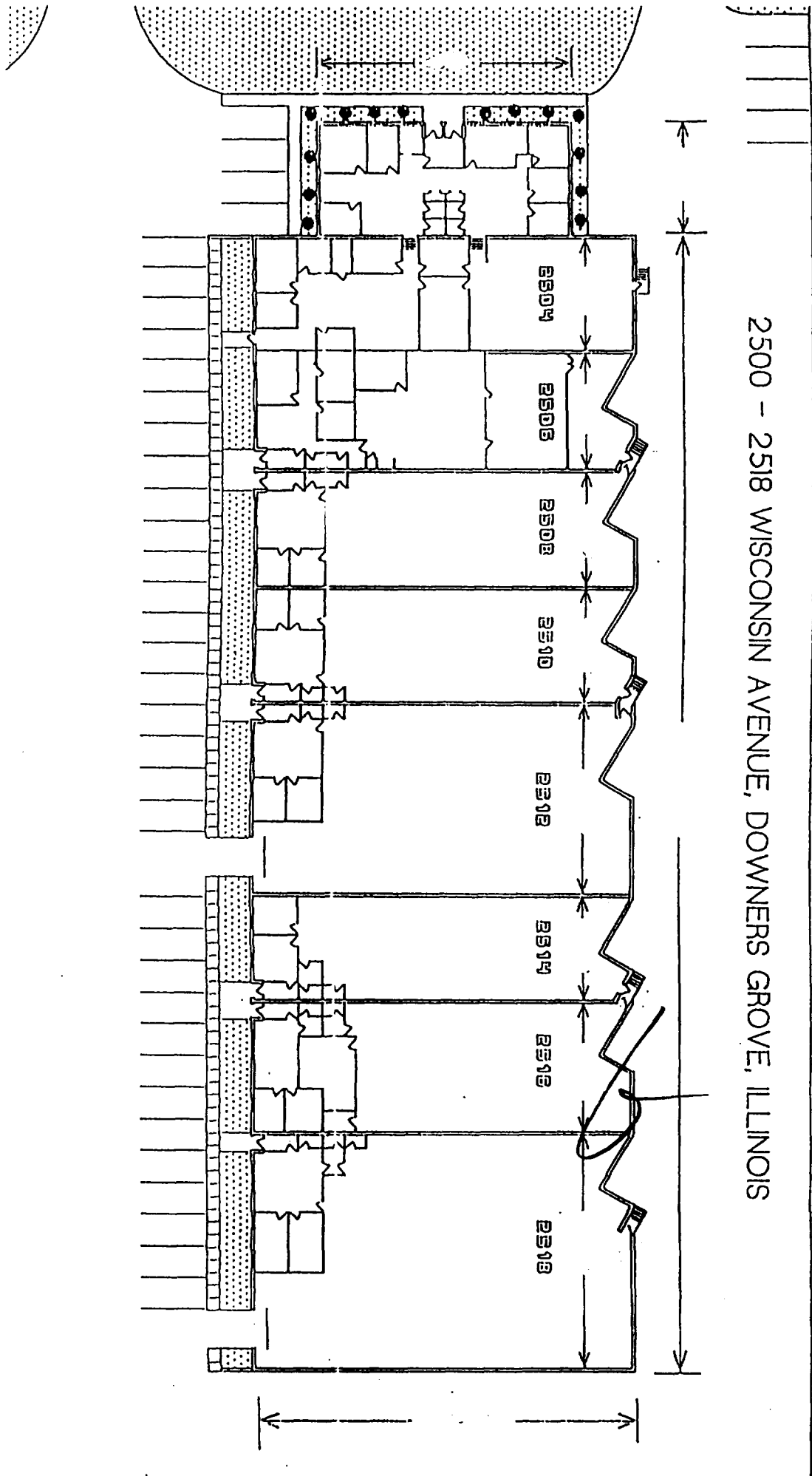
PRODUCT/SERVICE #	DESCRIPTION	QUANTITY	UOM	UNIT COST	TAX	ITEM TOTAL
0082104	WASTE, NON-SPECIFIC	2	DR	415.00	.00	830.00
0003369	EMPTY DRUM 55	2	EA	68.00	9.18	145.18
	INVOICE TOTAL				9.18	975.18

FOR INFORMATION PLEASE CALL SK SERVICING LOCATION: (847) 468-6510 ELGIN, IL

DO YOU KNOW HOW YOUR WASTES ARE BEING PROCESSED? IF NOT, ASK YOUR SAFETY-KLEEN REP FOR YOUR FREE COPY OF "A BUYER'S GUIDE TO POLLUTION CONTROL", AND TO EXPLAIN YOUR PERSONAL WASTE-FLOW DIAGRAM THAT'S INCLUDED. ONCE YOU SEE THIS, YOU'LL BETTER UNDERSTAND WHY WE CAN SAY THAT THE BEST WASTE RECYCLING SERVICE ON EARTH IS ALSO THE BEST VALUE.

FLOOR PLAN

2514-2518 Wisconsin Avenue

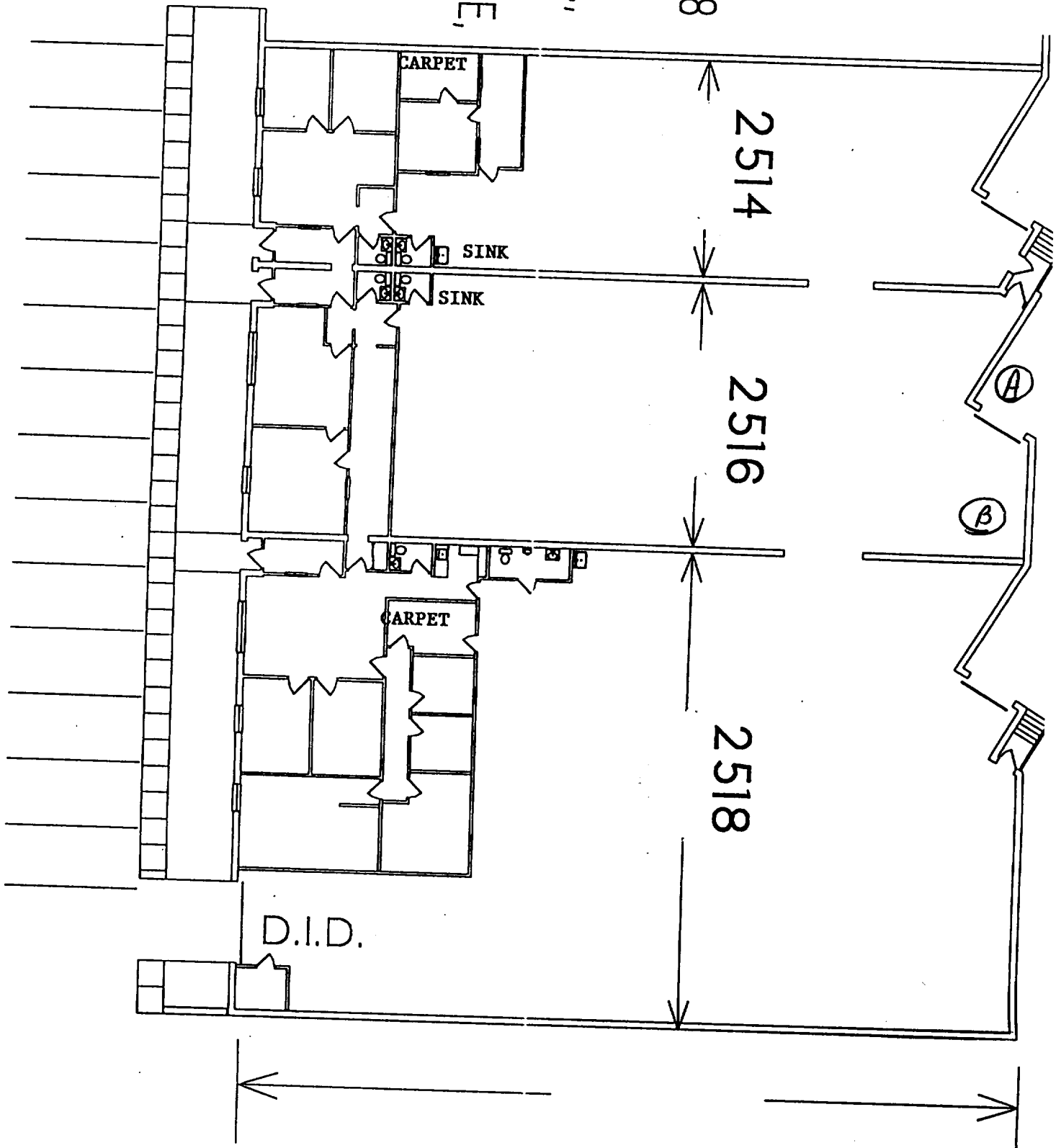


INITIALS

RRK

G

2514, 2516 & 2518  
 WISCONSIN AVE.,  
 DOWNERS GROVE,  
 ILLINOIS



A = LOCATION OF BFI WASTE BINS

B = FORMER LOCATION OF SAFETY KEEN TANK

INITIALS

ROK

G